

CHEM-SECURITY SYSTEMS, INC.

P.O. Box 1866 • Bellevue, Washington 98009 • (206) 827-0711

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7/26/1982

WA 2912

July 26, 1982

FILE COPY

Mr. Donald W. Moos, Director
Department of Ecology
Mail Stop PV-11
Olympia, Washington 98504

Mr. John Spencer
Regional Administrator
U. S. Environmental Protection Agency
Region 10
1200 Sixth Avenue
Seattle, Washington 98101

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WASTE MANAGEMENT BRANCH

Gentlemen:

In his July 23, 1982 letter, Ronald S. West, President of Chemical Processors, Inc. provided you with notification pursuant to 40 CFR 265.12(b) and WAC 173-303-290(2) of a planned change in ownership of certain of the Chemical Processors facilities. Specifically, on or about September 15, 1982, Chem-Security Systems, Inc. (CSSI) plans to execute the purchase of the business and assets at the following locations:

- 1) Alexander Street Facility, Tacoma, Washington;
- 2) South Lucille Street Facility, Seattle, Washington; and
- 3) Pier 91 Facility, Seattle, Washington.

In accordance with 40 CFR 122.23(c)(4) - Changes During Interim Status and WAC 173-303-820-(3), please find as Enclosures 1 through 3 a revised Part A of the RCRA permit application for each of the three (3) above named facilities. As you will notice, the permit applications identify CSSI as the owner and operator. Now that we are revising the Part A documents, I would also like to bring to your attention certain adjustments to each Part A. The nature and reasons for such adjustments are described in Enclosure 4.

In addition to the Part A revisions, 40 CFR 122.23(c) and WAC 173-303-820(3)(d) require that the new owner provide financial assurance for closure and insurance for sudden accidental occurrences. Therefore, in accordance with the rules governing facility closure and liability insurance requirements published in the April 7, 1982 and April 16, 1982 Federal Register, please find as Enclosure 5 specific information pertaining to each facility.



CSSI

A Subsidiary of Chem-Nuclear Systems, Inc.

USEPA RCRA



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AIR & HAZARDOUS MATERIALS DIV.

Messrs. Moos and Spencer
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As you are aware, the facilities are located in the State of Washington, a state where EPA is administering the requirements of 40 CFR 265. However, the Washington Department of Ecology has established hazardous waste regulations that include requirements for financial assurance of closure and liability coverage.

In our reading of 40 CFR 265.149, we notice that EPA will allow an operator to use state required financial mechanisms if it is found that the state mechanisms are at least equivalent to those specified in 40 CFR 265, Subpart H. In this regard, we request that the State of Washington regulations at WAC 173-303-620 be considered acceptable for meeting applicable EPA requirements. To assist EPA in its consideration, please find as Enclosure 6 a copy of our correspondence to the State of Washington which transmits a Surety Bond, Trust Agreement and a Certificate of Liability Insurance for each of the subject facilities. This information shows that funds for the required closure activity are a certainty and that liability coverage is in place.

For your information, the agreement between the parties for the purchase transaction calls for state and federal agency "recognition" of the new owner before the closing documents can be executed. In this regard we would ask that you provide an appropriate response at your earliest convenience. From our perspective such a response would likely be a recognition of CSSI as the new owner conditioned upon the execution of the purchase.

I thank you in advance for your prompt consideration of this request. If you, or your staff, have any questions, please feel free to contact me at 827-0711.

Sincerely,

CHEM-SECURITY SYSTEMS, INC.



Kenneth A. Lepic, Manager
Regulatory Affairs

KAL:slj

Enclosures

cc: Mr. Tom J. McCord, CSSI
Mr. Ronald S. West, Chemical Processors, Inc.

ENCLOSURE 4

Changes to Part A

Alexander Avenue Facility

Section III.C: The original submission showing "T01 652,4000" contained an extra "0" which was a typographical error. In addition, S02 was included in Section IV as an applicable process code but was inadvertently omitted from Section III. In order to properly describe the facility as it existed at the time Part A was originally submitted and as it exists today, the 652,400 gallon figure should represent tank storage (S02) while tank treatment (T01) should be 24,000 gallons per day.

South Lucille Street Facility

Section III.C: The facility has certain treatment processes which were inadvertently omitted from the Part A. These include cyanide destruction, chemical neutralization and solvent settling. In order for the Part A to properly reflect such operations which have long been routine processes, the Part A is adjusted to include T01 at 10,000 gallons per day.

Pier 91 Facility

Section III.C: The facility stores large quantities of materials much of which are not classified as hazardous wastes. In addition to storage, the facility always used oil/water separation, phenol oxidation, precipitation of heavy metals, pH adjustment and chromium reduction as a routine operation. This occurs in the storage tanks. For some unknown reason, the Part A inadvertently omitted the listing of tank treatment (T01) at 40,000 gallons per day. The Part A now includes such activities.

ENCLOSURE 5

Facilities For Which Financial Mechanisms
Have Been Established

EPA I.D. #: WAD-020 257 945
Name: Chem-Security Systems, Inc.
Address: 1701 Alexander Avenue
Tacoma, Washington 98421
Closure Funds: \$ 93,400.00
Liability Coverage: \$1,000,000.00 each occurrence
\$2,000,000.00 annual aggregate

EPA I.D. #: WAD-000 812 909
Name: Chem-Security Systems, Inc.
Address: 734 South Lucille Street
Seattle, Washington 98101
Closure Funds: \$ 11,660.00
Liability Coverage: \$1,000,000.00 each occurrence
\$2,000,000.00 annual aggregate

EPA I.D. #: WAD-000 812 017
Name: Chem-Security Systems, Inc.
Address: Pier 91
Seattle, Washington 98119
Closure Funds: \$ 26,202.00
Liability Coverage: \$1,000,000.00 each occurrence
\$2,000,000.00 annual aggregate